CONTROL

DUE DATE ACTION

JINDSAY, D. C

MARTINEZ. NAGEL, R. E NORTH, K.

RODGERS, A. D. SHELTON, D. C.

SPEARS, M. S. TRICE, K. D. TUOR, N. R. WILLIAMS, J. L.

BUTLER

BROOKS

CORRES.	CONTROL
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STATE OF COLORS ADO

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Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department of Public Health and Environment

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DIETER, E. S. E.

FERRERA, D. W.

FERRIJ, M. S.

GIACOMINI, J. J.

SOM, J. H.

August 20, 2003

Mr. Joseph Legare

Assistant Manager for Environment and Stewardship

U.S. Department of Energy Rocky Flats Field Office

10808 Highway 93, Unit A Golden, Colorado 80403-8200

RE: Approval, Industrial Area, Sampling and Analysis Plan, FY03 Addendum, IA#-03-14, August 2003

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has reviewed, and hereby approves, the subject sampling and analysis plan addendum. Drafts of the addendum, dated June 2003, were reviewed and comments were discussed with facility representatives. A copy of the Division's initial, written comments is attached for reference.

The Division suggests that sampling depths, COCs, required analytical methods, and the quality of existing data, be evaluated for use in the investigation before fieldwork begins. This would minimize the potential to delete proposed sample locations based solely on nearness to an exiting data point and the subsequent potential for an additional round of sample collection. As sample collection at each proposed site is expected, the Division may require specific justification for any deletions.

If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337 or David Kruchek at (303) 692-3328.

Sincerely,

COR CONTROL X X ADMN RECORD X > PATS/130

Reviewed for Addressee Corres. Control RFP Steven H. Gunderson RFCA Project Coordinator

8/23/03 lyg
Date By

Attachment

Rick DiSalvo, DOE Norma Castaneda, DOE

Tim Rehder, EPA

Antonia Property Duilding T130G

Lane Butler, KH Dave Shelton, KH

Mark Sattelberg, U.S.F&W

PLOSENSON

AUG 2003

Ref. Ltr. #

DOE ORDER#

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFYC. TON OFFICE

ADMIN RECORD

IA-A-001613

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Industrial Area

Sampling and Analysis Plan

FY 03 Addendum #IA-03-14

IHSS Groups 400-5 & 400-6

June 2003

General Comments:

- 1. A D&D well 40099, to the west of Building 444, indicates there may be a source of TCE in the area. As this area is paved, the 0 to 6 inch interval should be added to these samples. Deeper intervals may need to be sampled for VOCs depending on the in process results.
- 2. The area around building 439 has VOC samples planned to a depth of 1.5 feet, if a VOC source is found in this area, a ground water monitoring well should be installed down gradient as there is not a well sufficiently nearby.

Specific Comments:

- 3. Table 1: IHSS 400-205 should be shown as (Under the southeast portion of Building 460.)
- 4. <u>Section 2.0:</u> 2nd para. The Division prefers that specific interval, COC, and quality control data from existing sampling locations be evaluated for equivalency or sufficiency then unneeded locations of the proposed plan be removed from Table 3 and Figure 4. This would minimize the potential to delete a location and later determine that the existing data was inadequate. Also, see Comment No. 7.
- 5. <u>Figure 2:</u> Please include IHSSs/PACs/UBCs that exist in the buildings or immediate area, e.g., IHSS 116.2, to allow better coordination of the sampling plan in respect to the known or suspected releases.
- 6. Figure 4: Regarding Comment No. 4 please delete unneeded sampling locations.
- 7. It appears that only the previously sampled locations of IHSS 157.2, not all previous sample locations as shown on Figures 2 and 3, have been included on Figure 4. As such, the figure does not readily support a field decision on which samples could be deleted per Section 2.0.
- 8. Appendix C of the IASAP, bottom of page 44, discusses pressurization of a process waste line that culminated in radioactive materials being forced to the roof then to the ground via a gutter. There is no indication that biased sampling relative to the release has been included in the plan. Please evaluate the site of the release, Room 502, and the pathway to the gutter, downspout and ground surface and add biased samples as necessary.
- 9. Likewise, releases from docks, and at interfaces where contaminants may have runoff or blown off payement to soil, need to be considered for biased sampling. This requires close coordination to known or suspected releases from the building or within the immediate area. Please address.
- 10. Table 3: Analyses of VOCs in the 0.0-0.5 increment must be specified for sites 400-813, 400-115 and IHSS 205. Additionally, as agreed in other SAP Addenda, where the first soil interval is under pavement or building, VOCs should be sampled in the 0 to 6 inch interval.



11. Several locations are proposed for sampling to 10.5 feet. These locations correspond to locations on Figure 3 where VOCs, including vinyl chloride or TCE were previously found in the subsurface. Please discuss that aspect of the plan in Section 2.0.

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